## OF THE STATE OF HAWAII

In the Matter of the Application of	<u> </u>
HAWAIIAN ELECTRIC COMPANY, INC.	) ) DOCKET NO. 2008-0083
For Approval of Rate Increases and Revised Rate Schedules and Rules	) ) )

BECOME A PARTY

AND

CERTIFICATE OF SERVICE

PUBLIC UTILLITIES

08 JUL 29 A 10:52

DAVID C. COKER
GAYLE B. CHESTNUT
Associate Counsel
Naval Facilities Engineering Command, Pacific
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134

ATTORNEYS FOR DEPARTMENT OF DEFENSE

## OF THE STATE OF HAWAII

In the Matter of the Application of	)
HAWAIIAN ELECTRIC COMPANY, INC.	) DOCKET NO. 2008-0083
For Approval of Rate Increases and Revised Rate Schedules and Rules	) ) )

## MOTION TO INTERVENE AND BECOME A PARTY

Pursuant to Hawaii Administrative Rules ("HAR") sec. 6-61-55, this "Motion to Intervene and Become a Party" before the Public Utilities Commission of the State of Hawaii (Docket No. 2008-0083) is respectfully submitted by the Department of the Navy on behalf of the Department of Defense (collectively referred to herein as DoD), by and through its attorney.

As grounds for said intervention, Movant avers as follows:

1. Movant maintains numerous military installations within the State of Hawaii which activities obtain and use electric services from applicant companies Hawaiian Electric Company, Inc. (HECO or the Company), a public utility subject to this Commission's jurisdiction. The nature and extent of DoD's property, financial and other interests are substantial. The fact is that the DoD is one of the largest purchasers of electric services in the State of Hawaii. The DoD has been a party in other dockets related to Rate Increases and Rate Design, Integrated Resource Planning, and Demand Side

Management. The DoD has a crucial and strategic interest in securing electricity at the

lowest but fair cost.

2. The nature of the matters which are the subject of this docket could have a

substantial impact on the Movant.

3. It is not unlikely that the Movant's positions may be different from those advocated

by HECO, the Consumer Advocate, or any other party to the proceeding.

4. Movant's participation can assist in producing complete and accurate discovery and

developing a sound record. The DoD believes its participation will enable the

Commission to view and consider all the pertinent available information.

5. Movant's intervention would serve the public interest in that this Movant expends

funds on behalf of the taxpayers of the United States in the furtherance of the goals and

objectives of the Government. It is in the taxpayers' interest to ensure that their tax

dollars are (1) being spent to buy necessary goods and services that are reasonable in

price, and (2) to ensure that the expertise available to their government is utilized to its

maximum extent in ensuring the reasonableness and continued availability of the utility

services to the Government and the general public at the least cost. Movant's

intervention would not unreasonably broaden the issues or delay the proceedings in this

docket.

6. Communications in regard to this petition are to be addressed to:

Dr. Kay Davoodi

NAVFAC HQ

1322 Patterson Avenue, S.E., Suite 1000

Washington, DC 20374-5065

E-mail: khojasteh.davoodi@navy.mil

2

WHEREFORE, Movant requests an order granting Movant's Motion to Intervene and Become a Party hereto with the right to have notice of, and appear at the taking of testimony, produce and cross examine witnesses, and be heard in person or by counsel, upon brief and at oral argument, if oral argument is granted, and to otherwise be granted full party status herein.

Dated this 29th day of July, 2008.

Respectfully submitted,

ΔΆVID C. COKER

Associate Counsel (Code 09C)

Naval Facilities Engineering Command Pacific

258 Makalapa Drive, Suite 100 Pearl Harbor, Hi 96860-3134

**GAYLE B. CHESTNUT** 

Associate Counsel (Code 09C)

Naval Facilities Engineering Command Pacific

258 Makalapa Drive, Suite 100

Pearl Harbor, HI 96860-3134

ATTORNEYS FOR THE DEPARTMENT OF DEFENSE

## **CERTIFICATE OF SERVICE**

I hereby certify that one copy of the foregoing document was duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

The Honorable Mufi Hannemann Mayor, City and County of Honolulu Honolulu Hale 530 South King Street Honolulu, HI 96813

**Division of Consumer Advocacy** Department of Commerce and Consumer Affairs 333 Merchant Street, Room 326 Honolulu, HI 96813

2 Copies

Mr. Michael L. Brosch Utilitech, Inc. 740 North West Blue Parkway, Suite 204 Lee's Summit, Missouri 64086

Mr. Joseph A. Herz Sawvel & Associates, Inc. 100 East Main Cross Street, Suite 300 Findlay, OH 45840

DATED: July 29, 2008, Honolulu, Hawaii

DAVID C. COKER **Associate Counsel** 

Naval Facilities Engineering Command,

**Pacific**